



Ohio Administrative Code Rule 3337-12-27 Verification of student identity.

Effective: January 17, 2025

(A) Introduction

The Higher Education Opportunity Act (HEOA), public law 110-315 requires higher education institutions offering distance education or correspondence courses to have processes in place to ensure that the student registering for a course is the same student who participates in the course and receives course credit. As an accredited member institution of the higher learning commission (HLC), Ohio university recognizes the important of verifying student identity across all modalities and has implemented this policy for all admitted and enrolled students, regardless of how the education is delivered.

(B) Purpose

To align the university with federal requirements for verifying student identity, inform faculty and staff of these requirements, and mitigate risks of non-compliance.

(C) Scope

This policy applies to all university credit-bearing courses, including distance education, correspondence, and other comparable designations; in-person and hybrid instruction. It covers all stages from the application for admission through graduation, transfer, or withdrawal from study. All faculty, staff, and students are responsible for complying with this policy.

(D) Definitions

(1) Correspondence course - a course provided by an institution under which the institution provides instructional materials, by mail or electronic transmission, including examinations on the materials, to students who are physically distant from the instructors.



(2) Credit-bearing courses - academic instruction in the context of a course or activity leading to the award of transcript credit by a regionally or nationally accredited institution of higher education.

(3) Distance education- education that uses technology to deliver instruction to students who are physically distant from their instructors, while supporting regular and substantive interaction, either synchronously or asynchronously.

(4) Instructor - for the purposes of this policy, an instructor is an individual responsible for delivering course content and who meets the qualifications for instruction established by an accrediting body.

(5) Sensitive data - term used to describe the classification of data at a medium or high level of sensitivity that must be protected against unauthorized disclosure.

(E) Policy

Ohio university complies with federal regulations for verifying student identity across all modalities. The university employs processes for identity verification, including but not limited to the following, which may be updated as technology and best practices advance.

(1) Methods of verifying student identity

(a) Upon initial enrollment, the university ensures all new students' identities are verified. Individuals responsible for enabling a student's initial course registration are required to ensure that all new students' identities are verified in accordance with the information security standard: student identification verification.

(b) Secure login and pass code is provided as each student receives a unique user ID ("OHIO ID") and password.

(c) Proctored examinations may be used online or in-person to verify student identity.

(d) Pedagogical and related practices that are effective in verifying student identity are used by instructors.



(e) University-approved technologies are used to verify student identification. Instructors must use approved software but can request alternatives, if necessary, in accordance with the university's information security standards.

(2) Associated fees with verification of student identity

Federal regulations mandate that students be notified of any projected additional charges related to the verification of student identity at the time of registration or enrollment. If a course requires a proctored exam or has associated fees, the institution discloses to students this information upon registration. Additionally, it is the responsibility of university administration to ensure that the cost of attending the university is readily available to enrolled and prospective students, in compliance with Title 34, section 668.43 of the Code of Federal Regulations.

(3) Privacy protection

The university is committed to protecting student privacy in compliance with applicable privacy laws and relevant university policies. Methods used to verify student identity must implement reasonable and appropriate safeguards to protect student privacy.

(F) Questions

For questions about this policy or how the university balances student identity verification while respecting student privacy, please contact the office of audit, risk, and compliance at compliance@ohio.edu or privacy@ohio.edu.

(G) Reporting violations of this policy

While initial reporting through standard channels, including department leadership, is strongly encouraged, violations of this policy may be reported in good faith using the university's hotline, ethicspoint, which is operated by a third party. Reports may be submitted anonymously.

Violations of this policy will be addressed through the appropriate university disciplinary process



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based on the individual's classification.